

1
2
3
4
5
6
7
8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**

10 MARK HOFFMAN, on behalf of himself and
11 all others similarly situated,

12 Plaintiff,

13 vs.

14 REAGAN GOLD GROUP, LLC

15 Defendant.

Case No. 3:24-cv-06003

16
17 **MOTION FOR CLERK’S ENTRY OF DEFAULT AGAINST DEFENDANT**

18 COMES NOW Plaintiff, pursuant to Fed. R. Civ. P. 55(a), hereby files this Motion for
19 Clerk’s Entry of Default against Reagan Gold Group LLC (“Defendant”) in the above-styled
20 action. Plaintiff respectfully requests that the Clerk of Court enter default as the Defendant has
21 failed to serve or file an answer to Plaintiff’s claims in this action within the time permitted by
22 law or otherwise.

23 Federal Rule of Civil Procedure 12(a), entitled “Time to Serve a Responsive Pleading,”
24 provides in pertinent part that “[a] defendant must serve an answer within 21 days after being
25 served with the summons and complaint.” See Fed. R. Civ. P. 12(a)(1)(A)(i). Federal Rule of
26
27

1 Civil Procedure 55(a), entitled “Entering a Default,” provides that “[w]hen a party against
2 whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and
3 that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.” *See*
4 Fed. R. Civ. P. 55(a) (emphasis added).

5 Here, the Plaintiff filed his Complaint in December 2024. *See* ECF No. 1. The
6 Defendant was served on December 10, 2024 with its responsive pleading due on January 2,
7 2025. *See* ECF No. 6. However, the Defendant did not file a responsive pleading despite the
8 fact that it has acknowledged receipt of the lawsuit. Accordingly, the Plaintiff requests that the
9 Clerk enter the Defendant’s default pursuant to Fed. R. Civ. P. 55(a).
10

11 **CONCLUSION**

12 WHEREFORE, for the reasons set forth herein, the Plaintiff respectfully requests that
13 the Clerk of Court enter default against Defendant pursuant to Fed. R. Civ. P. 55(a).
14

15
16 RESPECTFULLY SUBMITTED AND DATED this 30th day of January, 2025.

17
18 By: /s/ Samuel J. Strauss, WSBA #46971
19 Samuel J. Strauss, WSBA #46971
20 Email: sam@turkestrauss.com
21 613 Williamson St., Suite 201
22 Madison, Wisconsin 53703
23 Telephone: (608) 237-1775
24 Facsimile: (608) 509-4423

25
26 *Attorneys for Plaintiff*
27

CERTIFICATE OF SERVICE

I, Samuel J. Strauss, hereby certify that on January 30, 2025, I caused the foregoing to be transmitted by mail to the following:

REAGAN GOLD GROUP, LLC
c/o Gautum Kumar
6800 Owensmouth Ave.
Suite 230
Los Angeles, CA 91303

DATED this 30th day of January, 2025.

STRAUSS BORRELLI PLLC

By: /s/ Samuel J. Strauss, WSBA #46971

Samuel J. Strauss, WSBA #46971

Email: sam@turkestrauss.com

613 Williamson St., Suite 201

Madison, Wisconsin 53703

Telephone: (608) 237-1775

Facsimile: (608) 509-4423

Attorneys for Plaintiff